

**IN THE DISTRICT COURT OF THE UNITED STATES  
FOR THE MIDDLE DISTRICT OF ALABAMA  
SOUTHERN DIVISION**

<b>HUBERT JONES,</b>	)	
<b>PLAINTIFF,</b>	)	
<b>V.</b>	)	<b>CIVIL ACTION NO: 1:05CV-612-MHT</b>
<b>DAVID JONES, et. al.,</b>	)	
<b>DEFENDANTS.</b>	)	

**PLAINTIFF'S RESPONSE TO EXPERIAN  
INFORMATION SOLUTIONS, INC. ANSWER**

Comes now the Plaintiff, Hubert Jones, by and through counsel of record, Donna C. Crooks, and files this his Response to the Defendant Experian Information Solutions, Inc.'s Answer and Defenses to the Amended Complaint filed heretofore and would show say as follows:

1. The Plaintiff adamantly denies that he failed to mitigate his damages, denies that Defendant's damages were caused wholly by acts or omissions of third persons and states that partly his damages were caused by the credit bureaus.
2. The Plaintiff adamantly denies that his claim is barred by laches.
3. The Plaintiff adamantly denies that he was negligent or contributorily negligent and further denies that he has unclean hands.

Respectfully submitted on this the 29<sup>th</sup> day of September, 2006.

s/Donna C. Crooks  
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**CERTIFICATE OF SERVICE**

This is to certify that on the 29th day of September, 2006, a true and correct copy of the above and foregoing document has been electronically filed with the foregoing Clerk of the Court using the CM/ECF system which will send notification of such filing to the following counsel and/or a copy is mailed via U.S. Mail, postage prepaid and properly addressed to those individuals who are non-CM/ECF participants:

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